

The Honorable Tana Lin

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
CAMERON JOHN WAGENIUS,
Defendant.

NO. CR24-232 TL

**STIPULATED MOTION FOR
PROTECTIVE ORDER**

Noting Date: January 8, 2025

The parties file this Stipulated Motion for Protective Order and present the proposed order attached herewith.

The Indictment charges the above-captioned defendant with two counts of unlawful transfer of confidential phone records information. As set forth in the attached proposed Protective Order, which is incorporated herein by reference, this case involves a substantial amount of electronic discovery, some of which contains personal identifying information, stolen victim data, other contraband, confidential company information, and otherwise sensitive information. The discovery material may also include law enforcement sensitive items related to ongoing investigation efforts and ongoing matters occurring before the grand jury.

1 Accordingly, the parties respectfully request that the Court enter the proposed
2 Protective Order governing discovery in this matter.

3 DATED this 8th day of January, 2025.
4

5 Respectfully submitted,
6

7 TESSA M. GORMAN
United States Attorney
8

9 */s/Sok Tea Jiang*
SOK TEA JIANG
10 Assistant United States Attorney
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
(206) 553-7970
12 sok.jiang@usdoj.gov

13 BRENT S. WIBLE
14 Principal Deputy Assistant Attorney General
Head of the Criminal Division
15

16 */s/George S. Brown*
GEORGE S. BROWN
17 Trial Attorney
Computer Crime and Intellectual Property Section
U.S. Department of Justice, Criminal Division
1301 New York Avenue NW Suite 600
Washington, D.C. 20530
(202) 514-1026
20 george.brown@usdoj.gov

21 *With email approval:*
22

23 */s/James Lee Bright*
JAMES LEE BRIGHT
24 3300 Oak Lawn Avenue, Suite 700
Dallas, Texas 75219
(214) 720-7777
25 JLBrightLaw@gmail.com
26 Attorney for Defendant Cameron John Wagenius
27

1 */s/Adam Stuart Heyman*
2 ADAM STUART HEYMAN
3 Heyman & Schueler, PLLC
4 901 Fifth Avenue, Suite 2800C
5 Seattle, WA 98164
6 (917) 952-6719
7 adam@heyman-schueler.com
8 Attorney for Defendant Cameron John Wagenius
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27